

Kathryn Pearson  
Elkhart General Hospital  
600 East Boulevard  
Elkhart, IN 46514

Dear Ms. Pearson:

Re: Exempt Construction Status,  
039-12402-00118

The application from Elkhart General Hospital, received on June 26, 2000 has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the construction of the following wet scrubber, to be located at 600 East Boulevard, Elkhart, Indiana, 46514 is classified as exempt from air pollution permit requirements:

- (a) One (1) wet scrubber, identified as S-1, used to control emissions from the incinerator (I-1), exhausting to stack S-1.

The following conditions shall be applicable:

- (1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:
  - (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.

This existing source has submitted their Part 70 application T039-11996-00118 on March 10, 2000. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Management (OAM) if the source proposes to construct new emission units, modify existing emission

units, or otherwise modify the source.

Sincerely,

Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Management

NH/EVP

cc: File - Elkhart County  
Elkhart County Health Department  
Air Compliance - Paul Karkiewicz  
Northern Regional Office  
Permit Tracking - Janet Mobley  
Air Programs Section- Michelle Boner  
Air Toxics Program Development Section - Mike Brooks  
Part 70 Application File - T039-11996-00118

## Indiana Department of Environmental Management Office of Air Management

### Technical Support Document (TSD) for an Exemption

#### Source Background and Description

**Source Name:** Elkhart General Hospital  
**Source Location:** 600 East Boulevard, Elkhart, Indiana 46514  
**County:** Elkhart  
**SIC Code:** 8062  
**Operation Permit No.:** 039-12402-00118  
**Permit Reviewer:** Nishat Hydari / EVP

The Office of Air Management (OAM) has reviewed an application from Elkhart General Hospital relating to the construction of a wet scrubber and to the re-lining of the incinerator.

#### New Emission Units and Pollution Control Equipment

The source consists of the following new emission units and pollution control devices:

- (a) One (1) wet scrubber, identified as S-1, used to control emissions from the incinerator (I-1), exhausting to stack S-1.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

#### Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (°F)
S-1	Wet Scrubber (S-1)	85	1.5	4700	120

#### Enforcement Issue

There are no enforcement actions pending.

#### Recommendation

The staff recommends to the Commissioner that the construction be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on June 26, 2000.

## Emission Calculations

There are no emission calculations because this exemption is only for the construction of the wet scrubber (S-1) and the re-lining of the incinerator.

## Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency.”

There is no potential to emit any criteria pollutants because this exemption is only for the construction of the wet scrubber (S-1) and the re-lining of the incinerator.

## County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	maintenance
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) and oxides of nitrogen (NO<sub>x</sub>) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NO<sub>x</sub> emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

## Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 T-039-11996-00118 application on March 10, 2000. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

## Federal Rule Applicability

- (a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to the scrubber.
- (b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR art 63) applicable to the scrubber.

## State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is located in Elkhart County and there is no potential to emit any criteria pollutants. Therefore, 326 IAC 2-6 does not apply.

The source will be required to annually submit a statement of the actual emissions of all federally regulated pollutants from the source, for the purpose of fee assessment.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**Air Toxic Emissions**

Indiana presently requests applicants to provide information on emissions of the 188 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Construction Permit Application Form Y.

None of the listed air toxics will be emitted from the scrubber.

**Conclusion**

The construction of this wet scrubber (S-1) shall be subject to the conditions of the attached proposed **New Source Construction and Exemption Permit 039-12402-00118**.